

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MAGISTRATE JUDGE KEYS

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

JESUS GONZALEZ

CASE NUMBER:

08CR 487

I, the undersigned complainant, being duly sworn state that the following is true and correct to the best of my knowledge and belief. On or about June 18, 2008, in Cook County, in the Northern District of Illinois, and elsewhere, defendant did

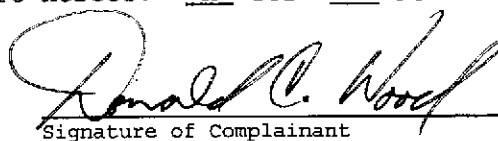
knowingly and intentionally possess with intent to distribute a controlled substance, namely, in excess of 500 grams of cocaine, a Schedule II Narcotic Drug Controlled Substance,

in violation of Title 21, United States Code, Section 841(a)(1). I further state that I am a Special Agent, Drug Enforcement Administration, and that this complaint is based on the following facts:

Please see attached affidavit.

Continued on the attached sheet and made a part hereof: x Yes No

FILED
6-20-08
JUN 20 2008 TC


Signature of Complainant

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Sworn to before me and subscribed in my presence,

June 20, 2008

at

Chicago, IL

Date

City and State

Arlander Keys, Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Donald C. Wood, being duly sworn on oath, state as follows:

1. I am a Special Agent with the Drug Enforcement Administration ("DEA"), United States Department of Justice, and have been so employed for over 10 years. Since September 2001, I have been assigned to the DEA Chicago Field Division. In connection with my official DEA duties, I investigate criminal violations of the federal narcotics laws, including, but not limited to, violations of Title 21, United States Code, Sections 841, 843, 846, and 848. I have been involved in various types of investigations, in the debriefing of defendants, witnesses, informants, and others who have knowledge of narcotics trafficking, and investigations involving the laundering and concealing of proceeds of drug trafficking. I received specialized training in the enforcement of laws concerning the activities of narcotics traffickers. Immediately prior to becoming a Special Agent with the DEA, I was a criminal investigator for the Cook County State's Attorney's Office and was so employed for approximately four years.

2. The information set forth in this Affidavit is based upon my participation in this investigation, interviews of witnesses, information obtained from other law enforcement officers, and my experience and training. The recitation of facts contained in this Affidavit is not meant to be a complete narrative of all that has occurred in connection with this investigation, but is only a summary of facts necessary to show probable cause that Jesus Gonzalez knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, in excess of 500 grams of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. On or about June 18, 2008, at approximately 12:45 p.m., DEA Agents went to

Jesus Gonzalez's residence located at 8144 South Kilpatrick, Chicago, Illinois, in order to conduct an investigative interview of Gonzalez and any others that reside at the aforementioned residence. Upon arriving at the residence, agents knocked and rang the bell for the residence. Agents observed that the house was equipped with surveillance cameras in the front and back of the house. No one answered, however, a white Denali SUV was parked in front of the house. Previous surveillance and a check of the title indicated that Jesus Gonzalez was the owner and operator of the white Denali SUV parked in front of the residence at 8144 South Kilpatrick, Chicago, Illinois. Agents walked to the back of the house and saw a plastic wrapper used for packaging cocaine lying in the grass in the back yard. The plastic wrapper contained a white powdery residue which field tested positive for cocaine.

4. At approximately 1:15 p.m., Agents saw a black Escalade SUV bearing Illinois license plate 8459161 driving in and around the area of the residence located at 8144 South Kilpatrick, Chicago, Illinois. The black Escalade drove past the residence and around the block approximately twice, slowing down each time that it drove past the residence at 8144 South Kilpatrick. Agents conducted a records inquiry of the black Escalade which indicated that it was registered to Jose and Rebecca Villasenor, at 684 South Edward in Romeoville, Illinois. Agents, who had conducted previous surveillance of the residence, had noted that a vehicle with the same registration had gone to the residence and parked in front of the garage. Agents conducting surveillance saw the passenger of the black Escalade, who was a Hispanic female (later identified as Gonzalez's wife), appear to be looking into various parked vehicles on Kilpatrick while talking on a cellular telephone. Based on my training and experience, I believe that the individuals in the black Escalade were attempting to identify the presence of law enforcement in and around the area of the residence.

5. At approximately 1:20 p.m., the black Escalade drove down the street from the residence at 8144 South Kilpatrick and parked. The occupants of the black Escalade appeared to be conducting surveillance on the block. Approximately 10 minutes later, the black Escalade left the area. DEA Agents maintained surveillance at the residence at 8144 South Kilpatrick. Agents also followed the black Escalade as it left the area.

6. Approximately 1:35 p.m., the black Escalade arrived at the Ford City Mall and parked. An individual, later identified as Gonzalez's wife, got out of the passenger side of the vehicle, a Hispanic female, later identified as Individual A, got out of the driver's side of the vehicle, and two children and an infant got out of the back of the vehicle. All five individuals entered the Ford City Mall. Agents maintained surveillance on the black Escalade.

7. At approximately 1:45 p.m., Agents saw a green Volkswagen Toureg bearing Illinois license plate X881426 driving in and around the area of the residence located at 8144 South Kilpatrick, Chicago, Illinois. Agents who had conducted previous surveillance had seen the green Toureg at the residence. Agents had determined that the Toureg was registered to Cynthia and Jesus Gonzalez at the address of the aforementioned residence. The green Toureg drove by the residence, slowed down, and continued. Agents saw the green Toureg drive in and around the area of the residence. Based on my training and experience, I believe that the driver of the green Toureg was conducting counter-surveillance and attempting to identify the presence of law enforcement. Agents saw the Toureg leave the area.

8. Approximately 10 to 15 minutes later, the Toureg returned to the area of 8144 South Kilpatrick and drove down the block of the residence. At that time, agents stopped the Toureg in front of the residence. Your affiant spoke to the driver of the Toureg, who identified himself, hereinafter Individual B. In summary, Individual B stated that he had borrowed the car

from Jesus Gonzalez and was there to visit his sister, Gonzalez's wife, at the residence at 8144 South Kilpatrick. Individual B stated that he had driven from Romeoville, Illinois. Individual B also stated that the keys to the vehicle belonged to Jesus Gonzalez. Individual B was unable to explain why he kept driving around the area of the residence, past the residence, and did not attempt to make contact with the occupants of the residence.

9. Agents also saw a blue Chevy Trailblazer at the end of the street when agents stopped the Toureg. It appeared that the driver of the Trailblazer was watching the agents conduct the stop of the Toureg. Agents had seen this same Trailblazer drive down the street in front of the residence, slow down while in front of the residence, and drive in and around the area of the residence. Based on my training and experience, I believe that the driver of the Trailblazer was conducting surveillance in the area of the residence. Agents approached the driver of the Trailblazer, who identified himself as a police officer who was also surveilling the residence because he had information that narcotics had been distributed out of the residence.

10. Agents believe that the individuals driving the black Escalade and the green Toureg were notified that law enforcement were attempting to make contact with the occupants of the residence at 8144 South Kilpatrick. Since Jesus Gonzalez's white Denali was parked in front of the residence, Agents knocked at the door and no one answered, the house was equipped with surveillance cameras, and at least two different vehicles associated with the residence appeared to be conducting surveillance of the neighborhood looking for law enforcement, your affiant believed that someone was inside the house.

11. During the conversation between your affiant and Individual B, he (Individual B) stated that he had a key to the residence at 8144 South Kilpatrick. Individual B also stated that he did not know whether anyone was inside the residence. Individual B gave the key to the

residence to your affiant. Agents entered the residence through the back door to search for people inside the house and secure the residence. While inside the house, agents saw a cooler, with its lid open, that contained a scale and two plastic bags containing a white powdery substance of suspected cocaine. Agents noted that the residence was unoccupied, at which time, they left and secured the residence.

12. At approximately 2:00 p.m., agents conducting surveillance of the black Escalade approached Individual A and Gonzalez's wife as they walked to the black Escalade. Agents interviewed Gonzalez's wife, who stated that she lives at 8144 South Kilpatrick with her husband Jesus Gonzalez. In summary, Gonzalez's wife also stated that the residence did not contain illegal contraband and gave consent to allow the agents to search her residence. Gonzalez's wife, however, asked to be present at the residence when the agents searched it. Gonzalez's wife also stated that Jesus Gonzalez had a gun inside the house but that he had a valid FOID card for the gun, and that she would show the agents where the gun was located.

13. At approximately 2:15 p.m., Gonzalez's wife and DEA agents arrived at the residence at 8144 South Kilpatrick. At that time, Gonzalez's wife and agents entered the residence. While in the residence, Gonzalez's wife executed a written consent form, allowing the agents to search the residence. As a result of the search of the residence, agents found and seized, among other items, approximately 4 kilograms of white powdery substance suspected to be cocaine, a large sum of U.S. currency, a loaded semi-automatic handgun, scales, a money counter, a heat sealer, a drug ledger, and narcotics packaging material. Agents conducted a field test of the white powdery substance which tested positive for cocaine.

14. Gonzalez's wife also consented to allow the agents to search the detached garage, and identified the key that opens the lock to the garage. Agents searched the garage and found

and seized approximately 20 brick like packages made of plastic and tape which appeared to be used to wrap kilograms of cocaine. The packages contained a white powdery residue suspected to be cocaine. The white powdery residue field tested positive for cocaine. Agents also found and seized several bottles of acetone, numerous inositol¹ bottles, a kilogram press², kilogram stamps³, and other items used to package cocaine.

¹Based on your affiant's training and experience, acetone and inositol are used in the reproduction and distribution of cocaine.

²Based on your affiant's training and experience, a kilogram press is used in to form one kilogram bricks of cocaine.

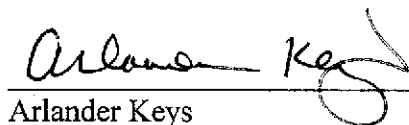
³Based on your affiant's training and experience, a stamp is used to place a symbol on the kilogram bricks of cocaine to identify the source of the cocaine.

15. During an interview, Gonzalez's wife stated in summary that Jesus Gonzalez traffics narcotics. Gonzalez's wife stated that she had spoken to Jesus Gonzalez about his narcotics activity and Jesus Gonzalez told her that he financially supports the family and that she can leave if she did not like his activities. She also stated that she had seen unknown males come to the house with gym bags, and meet with Jesus Gonzalez. She stated that Jesus Gonzalez stored the gym bags in the laundry closet or in the children's bedroom. Gonzalez's wife also stated that Jesus Gonzalez does not regularly discuss his narcotics trafficking business with her, and that he tries to hide his narcotics trafficking activities from her. She also stated that he is a drug addict. Gonzalez's wife also stated that she and Jesus Gonzalez are the only two adults who live at the residence. Also, they are the only individuals who have keys to the residence.



Donald C. Wood
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me
on this 20th day of June, 2008.



Arlander Keys
United States Magistrate Judge